

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

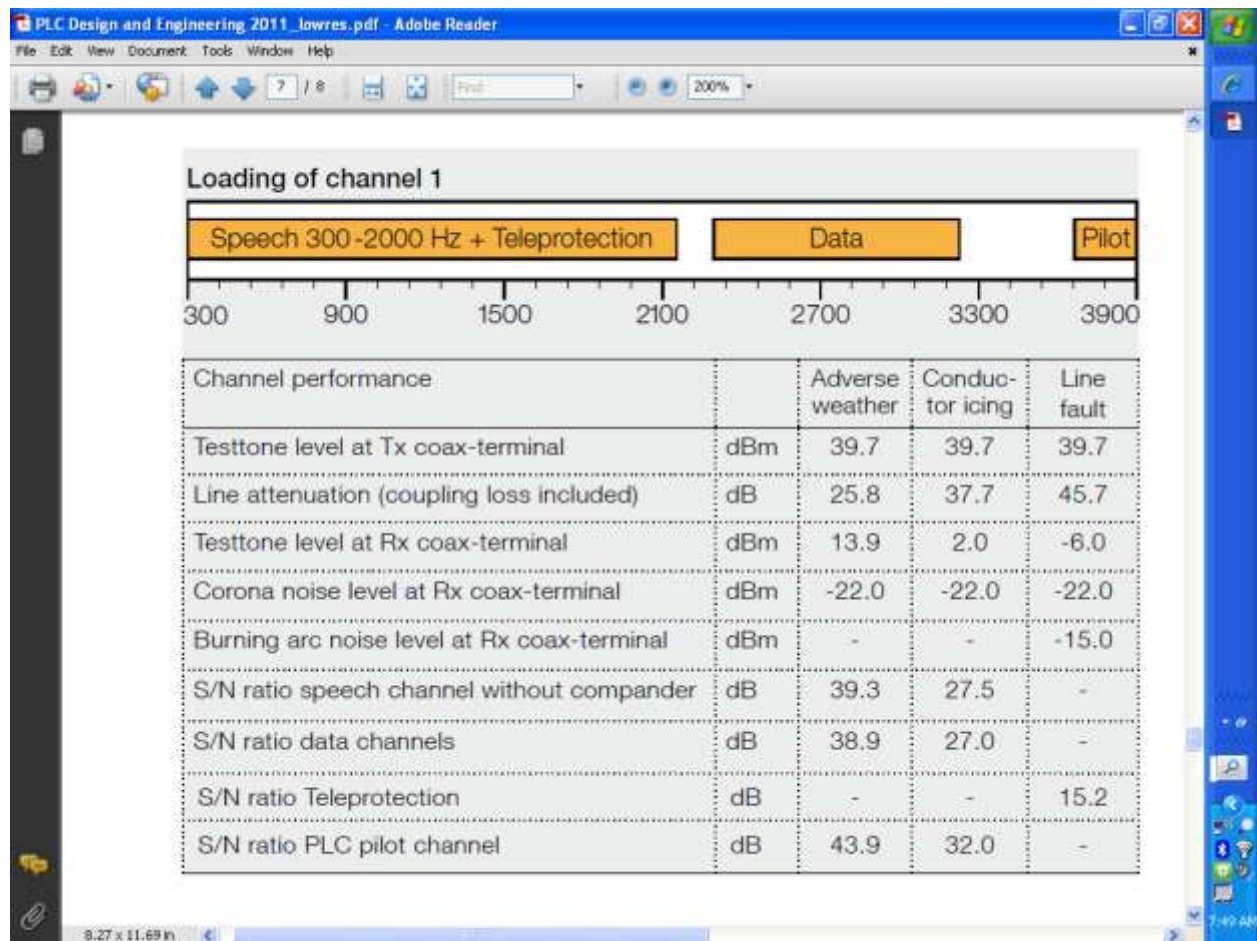
Amendment of Parts 1, 2, 15, 74, 78, 87, 90,)
and 97 of the Commission's Rules Regarding)
Implementation of the Final Acts of the World) ET Docket No. 12-338
Radiocommunication Conference)
(Geneva, 2007) (WRC-07), Other Allocation)
Issues, and Related Rule Updates)

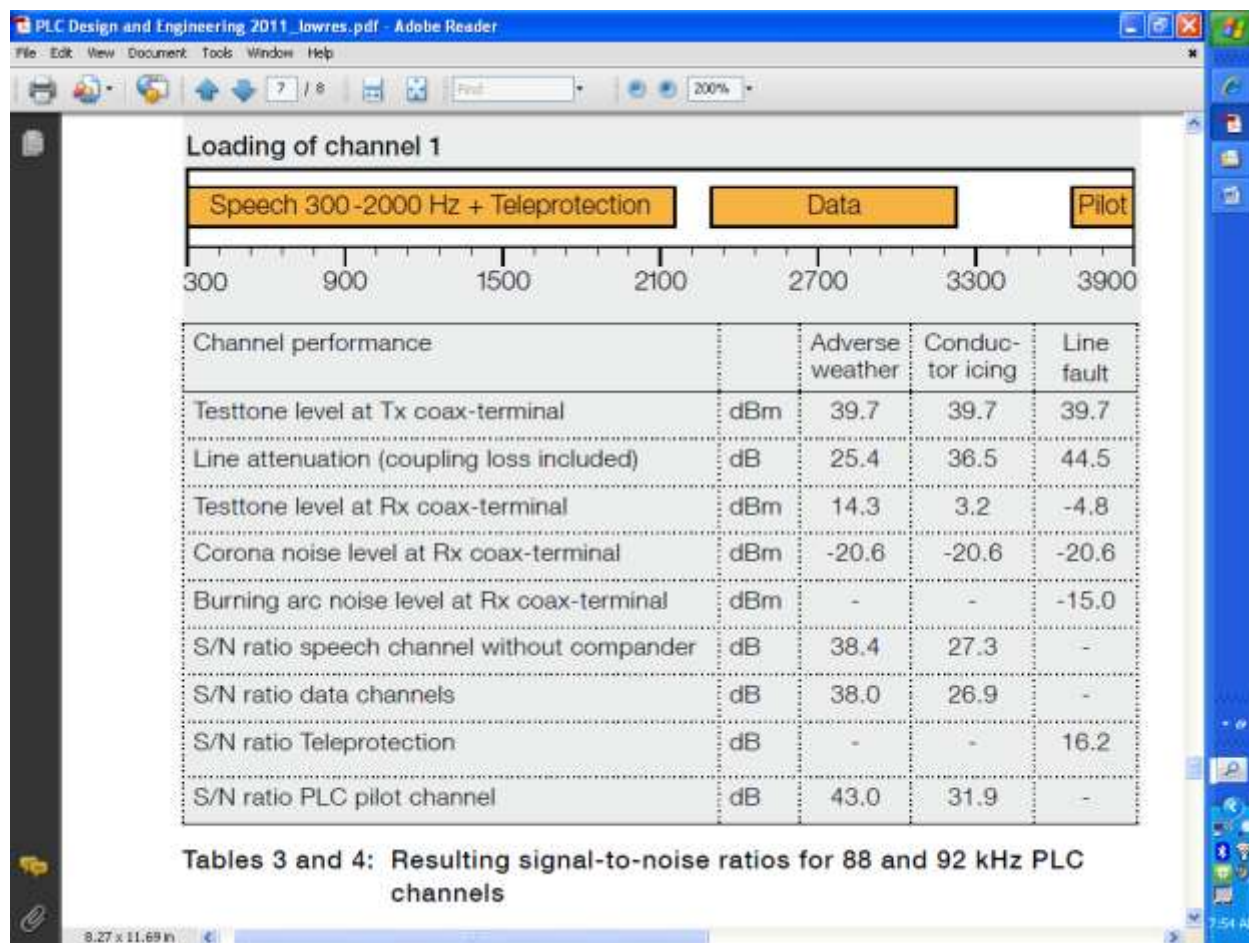
To the Commission:

**LIMITED REPLY COMMENTS OF WHEDBEE
TO REPLY COMMENTS OF ARRL; REPLY COMMENTS OF P. D. BALLINGER,
RETIREE OF FIRST ENERGY CORP.; AND, REPLY COMMENTS OF CRAIG WASSON**

COMES NOW the undersigned JAMES EDWIN WHEDBEE, who respectfully offers these late-filed reply comments in the above-captioned proceedings.

1. These reply comments are late because many submissions toward the end of the reply comment period were substantive and technical, requiring study. These reply comments are specifically directed to the reply comments of the ARRL, P.D. Ballinger, and Craig Wasson, with all of whom I agree. These reply comments are limited only to submitted concrete data supporting those with whom I agree.
2. Presented below are data for new PLC equipment available for purchase by U.S. electric utility companies showing their technical characteristics. Those technical data prove ARRL's assertion that an Amateur Radio Service station operating on 135.7-137.8 kHz at 1 Watt EIRP which is more than 1km distant from power lines will not interfere with this equipment.





WHEREFORE, the undersigned respectfully requests the Commission grant a secondary Amateur Radio Service allocation from 135.7 to 137.8 kHz with a 1 Watt EIRP limitation, on terms at least as favorable as proposed by ARRL.

Respectfully Submitted:

March 29, 2013

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